

# EXHIBIT A

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7 **UNITED STATES DISTRICT COURT**  
8 **NORTHERN DISTRICT OF CALIFORNIA**  
9 **SAN FRANCISCO DIVISION**

10 KALMAN ISAACS, individually and on  
11 behalf of all others similar situated,

12 Plaintiff,

13 v.

14 ELON MUSK and TESLA, INC.,

15 Defendants.  
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Case No.: 3:18-cv-04865-EMC

**DECLARATION OF GARY LINFORD IN  
FURTHER SUPPORT OF THE MOTION  
OF TEMPUS INTERNATIONAL FUND  
SPC AND OPPORTUNITY UNIQUE FUND  
INC.'S MOTION FOR (1)  
CONSOLIDATION OF RELATED  
ACTIONS; (2) APPOINTMENT AS LEAD  
PLAINTIFF; AND (3) APPROVAL OF  
THEIR CHOICE OF LEAD COUNSEL**

17 [Additional Captions Omitted]  
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1 I, Gary Linford, declare the following under penalty of perjury under the laws of the United  
2 States of America and pursuant to 28 U.S.C § 1746 as follows:

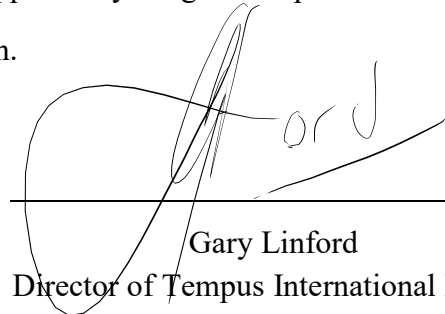
3 1. I am currently a member of the board of directors of Tempus International Fund SPC  
4 (“Tempus”).

5 2. The other member of Tempus’s board is John Lewis.

6 3. By Section 2.2 (p) of the Investment Manager Agreement dated August 12, 2012  
7 between Tempus and Opportunity Gestão Internacional De Recursos Ltda. (now known as  
8 Opportunity Gestão de Investimentos e Recursos Ltda. (“Opportunity”), Opportunity, as investment  
9 manager, is authorized to bring lawsuits on behalf of Tempus.

10 4. I have personal knowledge that Opportunity sought lead plaintiff status for Tempus  
11 on October 9, 2018 and I hereby ratify such action.

12 Dated: October 30, 2018

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16 Gary Linford  
17 Director of Tempus International Fund SPC  
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